REMARKS/ARGUMENTS

This paper is being provided in response to the Office Action for the above-referenced application. In this response, Applicants have added new Claims 64-68, canceled Claims 7-15, 19, 22-24, 26, 28-33, 37-38, and 40-63, and amended Claims 1-3, 16-18, 20, 21, 25, 27, 34-36 in order to clarify that which Applicants deem to be the claimed invention. Applicants respectfully submit that the amendments to the claims and the newly added claims are all supported by the originally filed application.

Applicants thank Examiner To for the courtesies extended in the telephone interview of January 27, 2005.

The rejection of Claims 1-63 under 35 U.S.C. § 102(e) as being anticipated by Lee et al. (Publication No. US 2001/0044720 A1, hereinafter referred to as "Lee") is hereby traversed and reconsideration thereof is respectfully requested. Applicants respectfully submit that this rejection as applied to Claims 7-15, 19, 22-24, 26, 28-33, 37-38, and 40-63 is moot in view of the cancellation of these claims herein. Accordingly, Applicant will address this rejection as applied to pending Claims 1-6, 16-18, 20-21, 25, 27, 34-36 and 39, as amended herein. Applicant respectfully submits that Claims 1-6, 16-18, 20-21, 25, 27, 34-36 and 39, as amended herein, are patentable over the cited reference of Lee.

Claim 1, as amended herein, recites a method of fulfilling an information need comprising: receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms; and determining one or more matches for the query, wherein a

criterion for determining one of said matches specifies that a relative order of at least one term of said query need not be preserved with respect to at least one other term included in said query. Claims 2-6, 16-18, 20-21, 25, 27, 34-36 and 39 depend from Claim 1.

Lee relates generally to the field of computer searching and retrieval, and more particularly to the field of computer searching and retrieval using natural English language input into the search system. (Par. 3). Lee's Figure 1 is a flowchart depicting steps in his search and retrieval methodology. The user inputs text strings (step 12). Words are extracted from the text strings using spaces as delimiters (step 14). A single property for each extracted word is determined using property rules (step 16). The rules use the word in question as a pivot and examine the properties of the word before and the word after the word being analyzed. The input sentence is cleaved into phrases based on the singular properties of the words as identified (step 26). The delimiter of each phrase is a conjunction, preposition or comma. The last noun of the first phrase is taken to be the topic (TP). The nouns and adjectives before the topic in the first phrase is termed the prefix description (Pre). The nouns and adjectives in the following phrases are termed the postfix description (Post). There is typically one Pre and one or more Posts. The input into the search stages include a topic containing a single work, and a prefix and a postfix description each containing a collection of words. In a first search stage, one or more permutations of TP, Pre and Post are input into one or more data miner applications to apply search permutations the various domains. The M top search results are combined and scored based on the occurrence of TP, Pre and Posts within the search results. The score is calculated by the occurrence of each word contained in the TP, Pre and Post descriptions. Points are added for exact matches using the same order of words found in the prefix description and topic. The scored results are then presented to the user as the search results. (Pars. 10-15).

Applicant's Claim 1, as amended herein, is neither disclosed nor suggested by Lee in that Lee neither discloses nor suggests *a method of fulfilling an information need, comprising: receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms; and determining one or more matches for the query, wherein a criterion for determining one of said matches specifies that a relative order of at least one term of said query need not be preserved with respect to at least one other term included in said query*, as set forth in amended Claim 1. Lee appears silent with regard to any disclosure or suggestion of a query including one or more at least partially unspecified terms. Rather, Lee discloses a user entering a text string. Lee discloses determining search results based on the user entered text strings, but neither discloses nor suggests determining matches for a query that includes an at least partially unspecified term.

As described in Applicant's specification, an unspecified term may be wholly or partially unspecified (e.g., page 23, line 9). An example of a wholly unspecified term is described, for example, on page 23, line 10-page 24, line 27 with reference to the queries illustrated in Figure 7. A partially unspecified term is also described, for example, at page 25, line 1-page 27 line 17 and in connection with various figures such as, for example, Figure 9. A partially unspecified term includes a restriction that defines a particular set of character sequences that can match the term. As an example, the restriction may require a matching term be a number, a proper name, a noun phrase, etc. The set of terms represented by the partially unspecified term can be defined by characteristics a member must possess to satisfy the associated restriction.

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Applicant respectfully submits that Lee makes no disclosure or suggestion of a query that includes *one or more at least partially unspecified terms*, as set forth in Applicant's amended Claim 1. Accordingly, Applicant respectfully submits that Lee neither discloses nor suggests any of the recited features of Applicant's amended Claim 1.
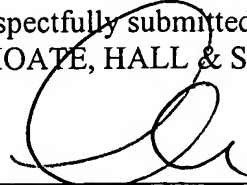
Since Lee neither discloses nor suggests the features of Applicant's amended independent Claim 1, Lee neither discloses nor suggests any claims that depend from independent Claim 1.

In view of the foregoing, Applicant respectfully requests that the rejection be reconsidered and withdrawn.

Applicant respectfully submits that newly added Claims 64-68 are also patentable over the cited art.

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Based on the above, Applicants respectfully request that the Examiner reconsider and withdraw all outstanding rejections and objections. Favorable consideration and allowance are earnestly solicited. Should there be any questions after reviewing this paper, the Examiner is invited to contact the undersigned at 617-248-4042.

Respectfully submitted,
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